

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	
	:	
v.	:	Criminal No. 06-
	:	
TERRANCE D. STRADFORD,	:	18 U.S.C. §§ 371, 1343,
a/k/a "Wayne Sellers," and	:	1956, 1957 & 2
CHRISTINA HACHADOORIAN,	:	
a/k/a "Christian Hachadoorian,"	:	
a/k/a "C.L. Doorian,"	:	
a/k/a "Crystal Doorian"	:	
	:	<u>I N D I C T M E N T</u>

The Grand Jury in and for the District of New Jersey,
sitting at Camden, charges:

COUNT 1

(Conspiracy to Commit Wire Fraud)

THE CONSPIRACY

1. From at least as early as in or about November 2003,
through in or about October 2004, in Burlington County, in the
District of New Jersey, and elsewhere, the defendants

TERRANCE D. STRADFORD,
a/k/a "Wayne Sellers,"
and
CHRISTINA HACHADOORIAN,
a/k/a "Christian Hachadoorian"
a/k/a "C.L. Doorian,"
a/k/a "Crystal Doorian,"

did knowingly and willfully conspire and agree with each other
and with others to commit an offense against the United States,
that is, to devise a scheme and artifice to defraud and to obtain
money and property by means of materially false and fraudulent
pretenses, representations and promises, as set forth below, and

to use interstate wire communications for the purpose of executing such scheme and artifice, contrary to Title 18, United States Code, Section 1343.

OBJECT OF THE CONSPIRACY

2. The principal object of the conspiracy was for the defendants TERRANCE D. STRADFORD and CHRISTINA HACHADOORIAN to obtain mortgage loans from commercial lenders by means of fraud, to enrich themselves and their coconspirators.

BACKGROUND

3. At all times relevant to this Indictment, defendant TERRANCE D. STRADFORD, a dentist who used the name Global Imaging Diagnostic in connection with his dental practice, was a resident of Manalapan, New Jersey, and Burlington, New Jersey.

4. At all times relevant to this Indictment, defendant CHRISTINA HACHADOORIAN was a former employee of defendant TERRANCE D. STRADFORD's dental practice and a resident of Burlington, New Jersey.

5. On or about October 8, 1999, defendant TERRANCE D. STRADFORD formed a limited liability company ("LLC") called 412-414 Commerce Lane, LLC ("412-414 LLC"). Defendant STRADFORD was the sole owner of 412-414 LLC, and listed "C.L. Doorian" as the agent for service of process on 412-414 LLC.

6. On or about December 10, 1999, defendant TERRANCE D. STRADFORD, acting through 412-414 LLC, purchased property located

at 412-414 Commerce Lane, West Berlin, New Jersey (the "Commerce Lane property") for \$337,500.

7. On or about December 10, 1999, defendant TERRANCE D. STRADFORD encumbered the Commerce Lane property with a mortgage in the amount of \$310,000 from American Business Credit, Inc. (the "ABC Mortgage")

8. On or about September 9, 2002 defendant TERRANCE D. STRADFORD encumbered the Commerce Lane property with a mortgage in the amount of \$244,756.47 from M.W. (the "M.W. Mortgage").

MEANS AND METHODS OF THE CONSPIRACY

9. Among the means and methods employed by the defendants and their coconspirators to carry out the conspiracy and effect its unlawful object were those set forth in Paragraphs 10 through 24 below.

The Quantum Loan

10. On or about May 24, 2004, defendants TERRANCE D. STRADFORD and CHRISTINA HACHADOORIAN opened a joint account at Commerce Bank, account number 7856480301, in the name of Global Imaging Diagnostic, LLC.

11. On or about June 22, 2004, defendant TERRANCE D. STRADFORD, acting on behalf of 412-414 LLC as the borrower, used the Commerce Lane property as collateral for a \$500,000 mortgage loan from Quantum Corporate Funding, Ltd., a lender in New York (the "Quantum loan"). The proceeds of the loan were purportedly

to be used to purchase medical equipment.

12. Defendant TERRANCE D. STRADFORD provided fraudulent documents to Quantum Corporate Funding, Ltd., including income tax returns containing a fake social security number for defendant STRADFORD, and title insurance commitment documents falsely indicating that there were no other mortgages on the Commerce Lane property. In fact, the ABC mortgage and the M.W. mortgage remained as liens on the Commerce Lane property. In deciding to issue the loan to 412-414 LLC, Quantum Corporate Funding, Ltd., relied on the defendants' false representations.

13. On or about June 22, 2004, defendant TERRANCE D. STRADFORD represented 412-414 LLC at the closing for the Quantum loan, and received a check in the amount of \$472,357 payable to "412-414 Commerce Lane, LLC," bearing the notation "TERRANCE D. STRADFORD bal. of loan proceeds."

14. Defendants TERRANCE D. STRADFORD and CHRISTINA HACHADOORIAN used the proceeds of the Quantum loan for their own benefit, including toward the purchase of a 1998 Maxum 46' yacht, using the aliases "Wayne Sellers" and "Christian Hachadoorian," on or about June 29, 2004.

The Eastern Loan

15. In or about late July and early August 2004, defendants TERRANCE D. STRADFORD and CHRISTINA HACHADOORIAN and others acting at their direction created a fictitious title company by

the name of Burlington Title Agency, LLC, and defendant CHRISTINA HACHADOORIAN opened bank accounts in the names of Burlington Title Agency, LLC, A.B.C., LLC, and Commonwealth Medical Supply, LLC.

16. On or about August 2, 2004, defendant TERRANCE D. STRADFORD, acting on behalf of 412-414 LLC, used the Commerce Lane property as collateral for a \$585,000 mortgage loan from Eastern Savings Bank, a lender in Maryland (the "Eastern loan"). The proceeds of the loan were purportedly to be used to refinance the ABC mortgage and purchase medical equipment from Commonwealth Medical Supply.

17. Defendants TERRANCE D. STRADFORD and CHRISTINA HACHADOORIAN and others acting at their direction provided fraudulent documents to Eastern Savings Bank, including Burlington Title Agency title insurance commitment documents falsely indicating that the only mortgage on the Commerce Lane property was a mortgage by American Business Company (not the actual issuer of the ABC mortgage, American Business Credit, Inc.). In fact, the ABC mortgage and the M.W. mortgage remained as liens on the Commerce Lane property. In deciding to issue the loan to 412-414 LLC, Eastern Savings Bank relied on the defendants' false representations

18. On or about August 2, 2004, defendant TERRANCE D. STRADFORD represented 412-414 LLC at the closing for the Eastern

loan, and loan proceeds totaling \$532,662.06 were disbursed to the accounts in the name of Burlington Title Agency, LLC, A.B.C., LLC, and Commonwealth Medical Supply, LLC, opened by defendant CHRISTINA HACHADOORIAN. Defendants TERRANCE D. STRADFORD and CHRISTINA HACHADOORIAN used the proceeds of the Eastern loan for their own benefit and not to refinance the ABC mortgage and purchase medical equipment from Commonwealth Medical Supply.

19. On or about August 6, 2004 defendants TERRANCE D. STRADFORD and CHRISTINA HACHADOORIAN, acting through an LLC, purchased a property in Belmont, North Carolina, in part with proceeds from the Eastern loan. The phone service at the North Carolina property was subscribed in the name "Crystal Dorian."

The Asset Loan

20. On or about September 14, 2004, defendant TERRANCE D. STRADFORD, acting on behalf of 412-414 LLC, used the Commerce Lane property as collateral for a \$275,000 mortgage loan from Asset Funding Group, LLC, a lender in Colorado (the "Asset loan"). The proceeds of the Asset loan were purportedly to be used to purchase medical equipment from Commonwealth Medical Supply.

21. Defendants TERRANCE D. STRADFORD and CHRISTINA HACHADOORIAN and others acting at their direction provided fraudulent documents to Asset Funding Group, LLC, including income tax returns containing a fake social security number for

defendant STRADFORD, and Burlington Title Agency title insurance commitment documents falsely indicating that there were no mortgages on the Commerce Lane property. In fact, the ABC mortgage and the M.W. mortgage remained as liens on the Commerce Lane property. In deciding to issue the Asset loan to 412-414 LLC, Asset Funding Group, LLC, relied on the defendants' false representations.

22. On or about September 14, 2004, defendant TERRANCE D. STRADFORD represented 412-414 LLC at the closing for the Asset loan, and Asset Funding Group, LLC, wire-transferred the loan proceeds of \$275,000 into the Burlington Title Agency, LLC, account opened by defendant CHRISTINA HACHADOORIAN. Defendants TERRANCE D. STRADFORD and CHRISTINA HACHADOORIAN used the proceeds of the Asset loan for their own benefit and not to purchase medical equipment from Commonwealth Medical Supply.

23. On or about September 15, 2004, defendant CHRISTINA HACHADOORIAN purchased a 2005 GMC Yukon Denali with proceeds from the Asset loan. On or about October 14, 2005, defendants TERRANCE D. STRADFORD and CHRISTINA HACHADOORIAN created an LLC called Blackbox Holdings Group and registered several vehicles under Blackbox Holdings Group, including the 2005 GMC Yukon Denali.

24. In or about October 2004, defendant TERRANCE D. STRADFORD sent Asset Funding Group, LLC, copies of fraudulent

mortgage discharges which falsely indicated that the ABC and M.W. mortgages on the Commerce Lane property had been paid off.

OVERT ACTS

In furtherance of the conspiracy and to effect its unlawful object, defendants TERRANCE D. STRADFORD and CHRISTINA HACHADOORIAN and their coconspirators committed, and caused to be committed, the following overt acts, in the District of New Jersey and elsewhere:

a. On or about November 19, 2003, defendant TERRANCE D. STRADFORD submitted a Uniform Residential Loan Application to a loan broker, seeking a mortgage on the Commerce Lane property and listing his address as 53 Equestrian Drive, Burlington, New Jersey, 08016.

b. On or about June 22, 2004, defendant TERRANCE D. STRADFORD represented 412-414 LLC at the closing for the Quantum loan.

c. On or about June 23, 2004, defendant TERRANCE D. STRADFORD deposited a check from the Quantum loan closing in the amount of \$472,357 into Commerce Bank account number 7856480301 in the name of Global Imaging Diagnostic, LLC (the "0301 account").

d. On or about June 24, 2004, defendant CHRISTINA HACHADOORIAN wrote a check to National Marine Investment Group in the amount of \$10,000 from the 0301 account, and signed it "C.L.

Doorian."

e. On or about June 29, 2004, defendant CHRISTINA HACHADOORIAN wire-transferred \$33,688.83 from the 0301 account to National Marine Investment Group.

f. On or about July 5, 2004, defendant CHRISTINA HACHADOORIAN opened Commerce Bank account number 7856480566 in the name of Global Imaging Diagnostic LLC (the "0566 account").

g. On or about July 5, 2004, defendant CHRISTINA HACHADOORIAN wrote and cashed a check to herself in the amount of \$30,000 from the 0566 account.

h. On or about July 5, 2004, defendant CHRISTINA HACHADOORIAN transferred \$331,119.43 from the 0301 account to the 0566 account.

i. On or about July 13, 2004, defendant TERRANCE D. STRADFORD deposited a check payable to General Abstract & Title in the amount of \$12,966 into the 0566 account.

j. On or about July 13, 2004, defendant CHRISTINA HACHADOORIAN wrote a check to "cash" in the amount of \$10,513.11 from the 0566 account, and purchased an official check in that amount from Commerce Bank.

k. On or about July 13, 2004, defendant CHRISTINA HACHADOORIAN wrote and cashed a check to herself in the amount of \$30,000 from the 0566 account.

l. On or about July 16, 2004, defendant CHRISTINA

HACHADOORIAN wrote and cashed a check to herself in the amount of \$30,000 from the 0566 account.

m. On or about July 21, 2004, defendant CHRISTINA HACHADOORIAN wrote and cashed a check to herself in the amount of \$30,000 from the 0566 account.

n. On or about July 23, 2004, defendant CHRISTINA HACHADOORIAN wrote and cashed a check to herself in the amount of \$30,000 from the 0566 account.

o. On or about July 28, 2004, defendant CHRISTINA HACHADOORIAN wrote and cashed a check to herself in the amount of \$30,000 from the 0566 account.

p. On or about July 28, 2004, defendant CHRISTINA HACHADOORIAN opened Commerce Bank account number 7856480707 in the name of Burlington Title Agency, LLC (the "BTA account").

q. On or about July 30, 2004, defendant CHRISTINA HACHADOORIAN wrote and cashed a check to herself in the amount of \$30,000 from the 0566 account.

r. On or about July 31, 2004, defendant CHRISTINA HACHADOORIAN opened Commerce Bank account number 7856480715 in the name of Commonwealth Medical Supply, LLC (the "CMS account").

s. On or about August 2, 2004, defendant TERRANCE D. STRADFORD represented 412-414 LLC at the closing for the Eastern loan.

t. On or about August 2, 2004, defendant CHRISTINA

HACHADOORIAN opened Commerce Bank account number 7856480194 in the name of A.B.C., LLC (the "ABC account").

u. On or about August 3, 2004, defendant CHRISTINA HACHADOORIAN deposited a check from the Eastern loan closing payable to American Business Co. in the amount of \$314,236.38 into the ABC account.

v. On or about August 3, 2004, defendant CHRISTINA HACHADOORIAN deposited a check from the Eastern loan closing payable to Commonwealth Medical Supply in the amount of \$193,000 into the CMS account.

w. On or about August 5, 2004, defendant CHRISTINA HACHADOORIAN withdrew \$314,000 from the ABC account and deposited it into the 0566 account.

x. On or about August 5, 2004, defendant CHRISTINA HACHADOORIAN withdrew \$190,000 from the CMS account and deposited it into the 0566 account.

y. On or about August 5, 2004, defendant CHRISTINA HACHADOORIAN deposited \$60,000 in cash into the 0566 account.

z. On or about August 5, 2004, defendant CHRISTINA HACHADOORIAN withdrew \$614,000 from the 0566 account and purchased an official check in that amount from Commerce Bank.

aa. On or about August 24, 2004, defendant CHRISTINA HACHADOORIAN transferred \$25,000 from the BTA account to the 0566 account.

bb. On or about September 14, 2004, defendant TERRANCE D. STRADFORD represented 412-414 LLC at the closing for the Asset loan.

cc. On or about September 15, 2004, defendant CHRISTINA HACHADOORIAN withdrew \$257,089.26 from the BTA account and deposited \$227,401.76 into the 0566 account.

dd. On or about September 15, 2004, defendant CHRISTINA HACHADOORIAN wrote a check to Arrow Pontiac GMC in the amount of \$52,223.30 from the 0566 account.

ee. On or about September 16, 2004, defendant CHRISTINA HACHADOORIAN wrote and cashed a check to herself in the amount of \$30,000 from the 0566 account.

ff. On or about October 25, 2004, defendant CHRISTINA HACHADOORIAN withdrew \$20,000 in cash from the 0566 account.

In violation of Title 18, United States Code, Section 371.

COUNTS 2 - 4

(Wire Fraud)

1. The allegations set forth in Paragraphs 2 through 24 of Count 1 of this Indictment are realleged and incorporated herein.

2. On or about the following dates, in Burlington County, in the District of New Jersey, and elsewhere, the defendants

TERRANCE D. STRADFORD,
a/k/a "Wayne Sellers,"
and
CHRISTINA HACHADOORIAN,
a/k/a "Christian Hachadoorian"
a/k/a "C.L. Dorian,"
a/k/a "Crystal Dorian,"

did knowingly and willfully devise and intend to devise a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, as described in Paragraphs 2 through 24 of Count 1.

3. For the purpose of executing the aforesaid scheme and artifice, in the District of New Jersey, and elsewhere, the defendants

TERRANCE D. STRADFORD,
a/k/a "Wayne Sellers,"
and
CHRISTINA HACHADOORIAN,
a/k/a "Christian Hachadoorian"
a/k/a "C.L. Dorian,"
a/k/a "Crystal Dorian,"

did knowingly and willfully transmit and cause to be transmitted by means of wire in interstate and foreign commerce the following writings, signs, signals, pictures and sounds:

<u>COUNT</u>	<u>DATE</u>	<u>WIRE TRANSMISSION</u>
2	6/29/04	Wire transfer of \$33,688.83 from the 0301 account to National Marine Investment Group.
3	8/23/04	Wire transfer of \$25,425.68 from the Eastern loan proceeds into the BTA account.
4	9/14/04	Wire transfer of \$275,000 from Asset Funding Group, LLC, into the BTA account.

In violation of Title 18, United States Code, Sections 1343 and 2.

COUNT 5

(Conspiracy to Commit Money Laundering)

1. The allegations set forth in Paragraphs 2 through 24 of Count 1 of this Indictment are realleged and incorporated herein.

2. From at least as early as in or about May 2004 to in or about October 2004, in the District of New Jersey and elsewhere, the defendants

TERRANCE D. STRADFORD,
a/k/a "Wayne Sellers,"
and
CHRISTINA HACHADOORIAN,
a/k/a "Christian Hachadoorian"
a/k/a "C.L. Doorian,"
a/k/a "Crystal Doorian,"

did knowingly and willfully conspire and agree with each other and with others to engage in monetary transactions in criminally derived property of a value greater than \$10,000, such property having been derived from specified unlawful activity, namely, wire fraud, and such transactions affecting interstate and foreign commerce, contrary to Title 18, United States Code, Section 1957(a).

In violation of Title 18, United States Code, Section 1956(h).

COUNTS 6 - 23

(Money Laundering)

1. Paragraphs 2 through 24 of Count 1 and Paragraph 3 of Counts 2 through 4 of this Indictment are realleged and incorporated herein.

2. On or about the dates set forth below, in Burlington County, in the District of New Jersey, and elsewhere, the defendants

TERRANCE D. STRADFORD,
a/k/a "Wayne Sellers,"
and
CHRISTINA HACHADOORIAN,
a/k/a "Christian Hachadoorian"
a/k/a "C.L. Doorian,"
a/k/a "Crystal Doorian,"

did knowingly and willfully engage in and attempt to engage in the following monetary transactions in criminally derived property of a value greater than \$10,000, such property having been derived from specified unlawful activity, namely, wire fraud, and such transactions affecting interstate and foreign commerce:

<u>COUNT</u>	<u>DATE</u>	<u>TRANSACTION</u>
6	July 5, 2004	Transferred \$331,119.43 to the 0566 account.
7	July 5, 2004	Cashed check number 91 in the amount of \$30,000, payable to defendant CHRISTINA HACHADOORIAN.
8	July 13, 2004	Cashed check number 1105 in the amount of \$10,513.11, payable to "cash" and signed by defendant

CHRISTINA HACHADOORIAN.

9	July 13, 2004	Cashed check number 1108 in the amount of \$30,000, payable to defendant CHRISTINA HACHADOORIAN.
10	July 13, 2004	Deposited check number 1494 in the amount of \$12,966, payable to General Abstract & Title and endorsed by defendant TERRANCE D. STRADFORD, into the 0566 account.
11	July 16, 2004	Cashed check number 1110 in the amount of \$30,000, payable to defendant CHRISTINA HACHADOORIAN.
12	July 21, 2004	Cashed check number 1115 in the amount of \$30,000, payable to defendant CHRISTINA HACHADOORIAN.
13	July 23, 2004	Cashed check number 1117 in the amount of \$30,000, payable to defendant CHRISTINA HACHADOORIAN.
14	July 28, 2004	Cashed check number 1119 in the amount of \$30,000, payable to defendant CHRISTINA HACHADOORIAN.
15	July 30, 2004	Cashed check number 1121 in the amount of \$30,000, payable to defendant CHRISTINA HACHADOORIAN.
16	August 1, 2004	Wrote check number 1122 in the amount of \$61,000, payable to "cash" and signed by defendant TERRANCE D. STRADFORD.
17	August 5, 2004	Deposited \$564,000 into the 0566 account.
18	August 5, 2004	Withdrew \$614,000 from the 0566 account and purchased a bank check in that amount.
19	August 24, 2004	Transferred \$25,000 to the 0566 account.

20	September 15, 2004	Deposited \$257,089.26 into the 0566 account.
21	September 15, 2004	Wrote check number 1187 in the amount of \$52,223.30, payable to Arrow Pontiac GMC and signed by defendant CHRISTINA HACHADOORIAN.
22	September 16, 2004	Cashed check number 1190 in the amount of \$30,000, payable to defendant CHRISTINA HACHADOORIAN.
23	October 25, 2004	Withdrew \$20,000 in cash from the 0566 account.

In violation of Title 18, United States Code, Sections
1957(a) and 2.

FORFEITURE ALLEGATION

The Grand Jury realleges and incorporates by reference the allegations contained in this Indictment for the purpose of noticing forfeiture pursuant to Title 18, United States Code, Section 981, and Title 28, United States Code, Section 2461.

As the result of committing the conspiracy and wire fraud offenses, in violation of 18 U.S.C. §§ 371 & 1343, as alleged in Counts 1 through 4 of this Indictment, the defendants

TERRANCE D. STRADFORD,
a/k/a "Wayne Sellers,"
and
CHRISTINA HACHADOORIAN,
a/k/a "Christian Hachadoorian"
a/k/a "C.L. Doorian,"
a/k/a "Crystal Doorian,"

shall forfeit to the United States pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461, all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of the offense, including but not limited to a sum of money equal to \$1,360,000 in United States currency, representing the amount of proceeds obtained as a result of the conspiracy and wire fraud offenses, in violation of 18 U.S.C. §§ 371 & 1343, as alleged in Counts 1 through 4 of the Indictment, for which the defendants are jointly and severally liable.

If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

(1) cannot be located upon the exercise of due diligence;

- (2) has been transferred or sold to, or deposited with, a third person;
- (3) has been placed beyond the jurisdiction of the Court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of said defendants up to the value of the above forfeitable property.

In violation of Title 18, United States Code, Section 981, Title 28, United States Code, Section 2461, and Title 18, United States Code, Sections 371 and 1343.

A TRUE BILL

FOREPERSON

CHRISTOPHER J. CHRISTIE
UNITED STATES ATTORNEY